

**AKIN GUMP STRAUSS HAUER & FELD LLP**

One Bryant Park  
New York, New York 10036  
Tel: (212) 872-1000  
Fax: (212) 872-1002  
Ira S. Dizengoff  
Arik Preis  
Mitchell Hurley  
Sara L. Brauner

*Counsel to the Official Committee of  
Unsecured Creditors of Purdue Pharma L.P., et al*

**COLE SCHOTZ P.C.**

500 Delaware Avenue, Suite 1410  
Wilmington, Delaware 19801  
Tel: (302) 652-3131  
Fax: (302) 652-3117  
Justin R. Alberto (admitted *pro hac vice*)

*Efficiency Counsel to the Official Committee of  
Unsecured Creditors of Purdue Pharma L.P., et al.*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re:	:	Chapter 11
	:	
PURDUE PHARMA L.P., <i>et al.</i> ,	:	Case No. 19-23649 (SHL)
	:	
Debtors. <sup>1</sup>	:	(Jointly Administered)
	:	

**THIRTY-SECOND MONTHLY FEE STATEMENT OF COLE SCHOTZ P.C.  
FOR COMPENSATION FOR SERVICES RENDERED AND  
REIMBURSEMENT OF EXPENSES AS CO-COUNSEL TO THE OFFICIAL  
COMMITTEE OF UNSECURED CREDITORS FOR THE PERIOD  
FROM OCTOBER 1, 2022 THROUGH OCTOBER 31, 2022**

<sup>1</sup> The Debtors in these cases, along with the last four digits of each Debtor's registration number in the applicable jurisdiction, are as follows: Purdue Pharma L.P. (7484), Purdue Pharma Inc. (7486), Purdue Transdermal Technologies L.P. (1868), Purdue Pharma Manufacturing L.P. (3821), Purdue Pharmaceuticals L.P. (0034), Imbrium Therapeutics L.P. (8810), Adlon Therapeutics L.P. (6745), Greenfield BioVentures L.P. (6150), Seven Seas Hill Corp. (4591), Ophir Green Corp. (4594), Purdue Pharma of Puerto Rico (3925), Avrio Health L.P. (4140), Purdue Pharmaceutical Products L.P. (3902), Purdue Neuroscience Company (4712), Nayatt Cove Lifescience Inc. (7805), Button Land L.P. (7502), Rhodes Associates L.P. (N/A), Paul Land Inc. (7425), Quidnick Land L.P. (7584), Rhodes Pharmaceuticals L.P. (6166), Rhodes Technologies (7143), UDF L.P. (0495), SVC Pharma L.P. (5717) and SVC Pharma Inc. (4014). The Debtors' corporate headquarters is located at One Stamford Forum, 201 Tresser Boulevard, Stamford, CT 06901.

<b>Applicant</b>	Cole Schotz P.C.
<b>Name of Client</b>	Official Committee of Unsecured Creditors
<b>Petition Date</b>	September 15, 2019
<b>Date of Order Approving Employment</b>	April 22, 2020 ( <i>nunc pro tunc</i> to February 24, 2020)
<b>Time Period Covered</b>	October 1, 2022 – October 31, 2022
<b>Total Fees Incurred</b>	\$61,892.50
<b>Voluntary Fee Reduction (10%)<sup>2</sup></b>	\$6,189.25
<b>Total Fees Requested (Total Fees – Voluntary Fee Reduction)</b>	\$55,703.25
<b>20% Holdback</b>	\$11,140.65
<b>Total Fees Requested Less 20% Holdback</b>	\$44,562.60
<b>Total Expenses Incurred</b>	\$7.00
<b>Total Fees and Expenses Requested</b>	\$55,710.25

Cole Schotz P.C. (“Cole Schotz”), in its capacity as efficiency counsel to the Official Committee of Unsecured Creditors (the “Committee”) of Purdue Pharma, L.P. and its affiliated debtors and debtors in possession (collectively, the “Debtors”), hereby submits this statement of fees and disbursements (the “Thirty-Second Monthly Fee Statement”) covering the period from October 1, 2022 through and including October 31, 2022 (the “Compensation Period”) in accordance with the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Retained Professionals* (the “Interim Compensation Order”) [D.I. 529]. By this Thirty-Second Monthly Fee Statement, Cole Schotz requests (a) interim allowance and payment of compensation in the amount of \$55,703.25 for fees on account of reasonable and necessary professional services rendered to the Committee by Cole Schotz and (b) reimbursement of actual and necessary costs and expenses in the amount of \$7.00 incurred by Cole Schotz during the Compensation Period.

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<sup>2</sup> Effective January 1, 2022, Cole Schotz agreed to reduce its monthly fees incurred in this matter by ten-percent (10%).

**FEES FOR SERVICES RENDERED  
DURING THE COMPENSATION PERIOD**

1. **Exhibit A** sets forth a timekeeper summary that includes the respective names, positions, department, bar admissions, hourly billing rates and aggregate hours spent by each Cole Schotz professional and paraprofessional that provided services to the Committee during the Compensation Period. The rates charged by Cole Schotz for services rendered to the Committee are the same rates that Cole Schotz charges generally for professional services rendered to its non-bankruptcy clients.<sup>3</sup>

2. **Exhibit B** sets forth a task code summary that includes the aggregate hours per task code spent by Cole Schotz professionals and paraprofessionals in rendering services to the Committee during the Compensation Period.

3. **Exhibit C** sets forth a complete itemization of tasks performed by Cole Schotz professionals and paraprofessionals that provided services to the Committee during the Compensation Period.

**EXPENSES INCURRED DURING THE COMPENSATION PERIOD**

4. **Exhibit D** sets forth a disbursement summary that includes the aggregate expenses, organized by general disbursement categories, incurred by Cole Schotz in connection with services rendered to the Committee during the Compensation Period.

5. **Exhibit E** sets forth a complete itemization of disbursements incurred by Cole Schotz in connection with services rendered to the Committee during the Compensation Period.

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<sup>3</sup> Cole Schotz increased its rates on September 1, 2022, consistent with its customary practice and as disclosed in Cole Schotz's retention application. See ECF No. 1013. Cole Schotz filed a notice of such rate increase on August 29, 2022. See ECF No. 5043.

**NOTICE**

6. Notice of this Thirty-Second Monthly Fee Statement will be given to (i) Purdue Pharma L.P., 201 Tresser Blvd, Stamford, CT 06901, Attn: Jon Lowne ([Jon.Lowne@pharma.com](mailto:Jon.Lowne@pharma.com)); (ii) counsel to the Debtors, Davis Polk & Wardwell LLP, 450 Lexington Avenue, New York, New York 10017, Attn.: Christopher Robertson ([christopher.robertson@davispolk.com](mailto:christopher.robertson@davispolk.com)) and Dylan Consla ([dylan.consla@davispolk.com](mailto:dylan.consla@davispolk.com)); (iii) the Office of the United States Trustee, U.S. Federal Office Building, 201 Varick Street, Suite 1006, New York, New York 10014, Attn: Paul K. Schwartzberg ([Paul.Schwartzberg@usdoj.gov](mailto:Paul.Schwartzberg@usdoj.gov)); and (iv) the independent fee examiner appointed in these chapter 11 cases, David M. Klauder, Esq., Bielli & Klauder, LLC, 1204 N. King Street, Wilmington, Delaware, 19801 ([dklauder@bk-legal.com](mailto:dklauder@bk-legal.com)) (collectively, the “Notice Parties”).

7. Objections to this Thirty-Second Monthly Fee Statement, if any, must be filed with the Court and served upon the Notice Parties and undersigned counsel to the Committee so as to be received by no later than December 23, 2022 at 12:00 p.m. (ET) (the “Objection Deadline”), setting forth the nature of the objection and the amount of fees or expenses at issue.

8. If no objections to this Thirty-Second Monthly Fee Statement are filed and served as set forth above, the Debtors shall promptly pay eighty percent (80%) of the fees and one hundred percent (100%) of the expenses identified herein.

9. If an objection to this Thirty-Second Monthly Fee Statement is received on or before the Objection Deadline, the Debtors shall withhold payment of that portion of this Thirty-Second Monthly Fee Statement to which the objection is directed and promptly pay the remainder of the fees and disbursements in the percentages set forth above. To the extent such an objection is not

resolved, it shall be preserved and scheduled for consideration at the next interim fee application hearing to be heard by the Court.

Dated: December 9, 2022  
New York, New York

**AKIN GUMP STRAUSS HAUER & FELD LLP**

/s/ Arik Preis

Ira Dizengoff

Arik Preis

Mitchell Hurley

Sara Brauner

One Bryant Park

New York, New York 10036

Telephone: (212) 872-1000

Facsimile: (212) 872-1002

- and -

**COLE SCHOTZ P.C.**

Justin R. Alberto (No. 5126)

500 Delaware Avenue, Suite 1410

Wilmington, Delaware 19801

Telephone: (302) 652-3131

Facsimile: (302) 652-3117

jalberto@coleschotz.com

*Co-Counsel to the Official Committee of Unsecured  
Creditors of Purdue Pharma L.P., et al.*

**EXHIBIT A**

**COMPENSATION BY TIMEKEEPER**  
**OCTOBER 1, 2022 THROUGH OCTOBER 31, 2022**

<b>Name of Professional Person</b>	<b>Date of Bar Admission</b>	<b>Position with the Applicant and Number of Years in that Position</b>	<b>Hourly Billing Rate<sup>1</sup></b>	<b>Total Billed Hours</b>	<b>Total Compensation</b>
Justin R. Alberto	2008	Member (Bankruptcy) (since 2020)	\$740.00	8.7	\$6,438.00
Patrick J. Reilley	2003	Member (Bankruptcy) (since 2011)	\$730.00	0.7	\$511.00
Anthony De Leo	2013	Associate (Bankruptcy) (since 2020)	\$685.00	60.6	\$41,511.00
Ian R. Phillips	2015	Associate (Litigation) (since 2016)	\$480.00	7.1	\$3,408.00
Peter Strom	2021	Associate (Bankruptcy) (since 2020)	\$375.00	0.2	\$75.00
Jack Dougherty	2021	Associate (Bankruptcy) (since 2020)	\$400.00	12.1	\$4,840.00
Michael Fitzpatrick	2022	Associate (Bankruptcy) (since 2020)	\$400.00	0.2	\$80.00
Conor D. McMullan	2019	Associate (Bankruptcy) (since 2022)	\$375.00	1.2	\$450.00
Larry Morton	N/A	Paralegal (Bankruptcy) (since 2020)	\$355.00	12.9	\$4,579.50
<b>TOTAL</b>				<b>103.7</b>	<b>\$61,892.50</b>
<b>Less Voluntary Reduction (10%)</b>					<b>(\$6,189.25)</b>
<b>Total Requested</b>					<b>\$55,703.25</b>

<sup>1</sup> On August 29, 2022 Cole Schotz filed its *Notice of Increase of Hourly Rates of Cole Schotz's Professionals* [ECF No. 5043] which adjusted hourly rates effective September 1, 2022.

**EXHIBIT B**

**COMPENSATION BY PROJECT CATEGORY**  
**OCTOBER 1, 2022 THROUGH OCTOBER 31, 2022**

<b>Project Category</b>	<b>Total Hours</b>	<b>Total Fees</b>
Committee Matters and Creditor Meetings	3.4	\$2,437.50
Fee Application Matters/Objections	27.3	\$11,085.00
Litigation/Gen. (Except Automatic Stay Relief)	70.7	\$46,668.00
Prepare for and Conduct Interview and Depositions	2.3	\$1,702.00
<b>TOTAL</b>	<b>103.7</b>	<b>\$61,892.50</b>
<b>Less Voluntary Reduction (10%)</b>		<b>(\$6,189.25)</b>
<b>Total Requested</b>		<b>\$55,703.25</b>

**EXHIBIT C**

**Invoice**





PURDUE PHARM, L.P.  
N/A - FEE APPLICATION ONLY

Invoice Date: December 4, 2022  
Invoice Number: 935850  
Matter Number: 60810-0001

**Re:** OFFICIAL COMMITTEE OF UNSECURED CREDITORS

FOR PROFESSIONAL SERVICES THROUGH OCTOBER 31, 2022

**COMMITTEE MATTERS AND CREDITOR MEETINGS** **3.40** **2,437.50**

<u>DATE</u>	<u>INITIALS</u>	<u>Description</u>	<u>HOURS</u>	<u>AMOUNT</u>
10/03/22	JRA	EMAIL WITH A. PREIS RE TODAY'S UCC CALL	0.10	74.00
10/06/22	ADL	REVIEW COMMITTEE UPDATE	0.10	68.50
10/06/22	JRA	EMAIL WITH A. PREIS RE TODAY'S UCC CALL	0.10	74.00
10/09/22	JRA	EMAIL WITH A. PREIS RE UCC CALL SCHEDULE	0.10	74.00
10/13/22	PJR	PARTICIPATE ON CALL WITH COMMITTEE MEMBERS AND PROFESSIONALS RE: CASE STATUS	0.50	365.00
10/13/22	PJR	REVIEW MATERIALS IN ADVANCE OF COMMITTEE CALL	0.20	146.00
10/13/22	ADL	REVIEW COMMITTEE UPDATE AND ATTACHMENTS	0.60	411.00
10/13/22	JRA	PARTICIPATE IN UCC UPDATE CALL WITH A. PREIS, E. MINN, L. SZLEZINGER AND UCC MEMBERS	0.50	370.00
10/13/22	ADL	ATTEND COMMITTEE CALL	0.50	342.50
10/16/22	JRA	EMAIL WITH A. PREIS RE UCC UPDATE	0.10	74.00
10/17/22	ADL	REVIEW COMMITTEE UPDATE	0.10	68.50
10/20/22	JRA	EMAIL WITH A. PREIS RE TODAY'S UCC CALL	0.10	74.00
10/24/22	JRA	REVIEW A. PREIS UCC UPDATE EMAIL	0.10	74.00
10/26/22	JRA	REVIEW A. PREIS UCC UPDATE EMAIL	0.20	148.00
10/27/22	JRA	EMAILS WITH A. PREIS RE TODAY'S UCC CALL	0.10	74.00

**FEE APPLICATION MATTERS/OBJECTIONS** **27.30** **11,085.00**

<u>DATE</u>	<u>INITIALS</u>	<u>Description</u>	<u>HOURS</u>	<u>AMOUNT</u>
10/03/22	JMD	EMAIL L. MORTON AND A. DELEO RE: COLE SCHOTZ FEE APP STATUS	0.10	40.00
10/03/22	JMD	REVIEW AND REVISE DRAFT AUGUST FEE STATEMENT (1.5); EMAIL TO A. DELEO RE: REVISIONS TO SAME (.1).	1.60	640.00
10/03/22	LSM	REVIEW MONTHLY FEE APPLICATIONS FOR INTERIM FEE APPLICATION DRAFT PREPARATIONS	0.80	284.00
10/03/22	LSM	REVISE, UPDATE AND FORWARD AUGUST, 2022 MONTHLY FEE APPLICATION FOR COLE SCHOTZ TO J. DOUGHERTY	0.50	177.50
10/04/22	LSM	UPDATE ALL MONTHLY FEE APPLICATIONS FOR EIGHTH INTERIM FEE APPLICATION FOR COLE SCHOTZ	0.90	319.50

Re: OFFICIAL COMMITTEE OF UNSECURED CREDITORS  
Client/Matter No. 60810-0001

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<u>DATE</u>	<u>INITIALS</u>	<u>Description</u>	<u>HOURS</u>	<u>AMOUNT</u>
10/06/22	JMD	CALL W/ A. DELEO RE: INTERIM FEE APP	0.10	40.00
10/06/22	LSM	CONTINUE DRAFT OF EIGHTH INTERIM FEE APPLICATION FOR COLE SCHOTZ	0.40	142.00
10/06/22	ADL	CALL WITH J. DOUGHERTY RE: INTERIM FEE APPLICATION	0.10	68.50
10/06/22	ADL	REVIEW AND COMMENT ON CS AUGUST FEE APPLICATION	0.50	342.50
10/07/22	LSM	CONTINUE DRAFT OF EIGHTH INTERIM FEE APPLICATION FOR COLE SCHOTZ	0.90	319.50
10/10/22	LSM	CONTINUE DRAFT OF EIGHTH INTERIM FEE APPLICATION FOR COLE SCHOTZ	0.50	177.50
10/10/22	JMD	EMAIL L. MORTON RE: INTERIM FEE APP	0.10	40.00
10/11/22	JRA	EMAIL WITH A. DELEO RE FEE APP	0.10	74.00
10/11/22	JMD	CONTINUE TO REVIEW/REVISE DRAFT INTERIM FEE APPLICATION	5.20	2,080.00
10/11/22	LSM	COMPLETE DRAFT OF EIGHTH INTERIM FEE APPLICATION FOR COLE SCHOTZ AND FORWARD SAME TO J. DOUGHERTY	3.30	1,171.50
10/11/22	JMD	REVIEW AND REVISE CS 8TH INTERIM FEE APP	1.50	600.00
10/11/22	JMD	EMAILS W/ A. DELEO RE: INTERIM FEE APP	0.20	80.00
10/12/22	JMD	FURTHER REVIEW AND REVISE INTERIM FEE APPLICATION	1.10	440.00
10/12/22	JMD	EMAIL TO A. DELEO RE: REVISIONS TO INTERIM FEE APPLICATION	0.30	120.00
10/13/22	JRA	EMAILS WITH A. PREIS AND E. LISOVICZ RE FEE APPS	0.20	148.00
10/14/22	ADL	REVIEW CS INTERIM FEE APPLICATION	0.90	616.50
10/14/22	JMD	CALL W/ A. DELEO RE: INTERIM FEE APP	0.10	40.00
10/14/22	JMD	EMAILS W/ A. DELEO AND J. ALBERTO RE: INTERIM FEE APP	0.10	40.00
10/14/22	ADL	CALL WITH J. DOUGHERTY RE: INTERIM FEE APPLICATION	0.10	68.50
10/17/22	ADL	EMAIL E. LISOVICZ RE: AUGUST FEE APPLICATION	0.20	137.00
10/17/22	JRA	EMAILS WITH A. DELEO RE REVISIONS TO FEE APP	0.30	222.00
10/19/22	ADL	EMAIL E. LISOVICZ RE: CS FEE APPLICATIONS	0.10	68.50
10/25/22	LSM	DRAFT THIRTY-FIRST MONTHLY FEE APPLICATION FOR COLE SCHOTZ RE: SEPTEMBER, 2022 FEES/EXPENSES	1.30	461.50
10/25/22	JMD	REVIEW EMAILS RE: FINALIZE SEPTEMBER INVOICE (.1); REVIEW SEPTEMBER INVOICE (.1); EMAIL TO L. MORTON AND A. DELEO RE: PREPARE FIRST DRAFT OF COLE SCHOTZ 31ST MONTHLY FEE STATEMENT (.1).	0.30	120.00
10/26/22	LSM	CONTINUE DRAFT OF THIRTY-FIRST MONTHLY FEE APPLICATION FOR COLE SCHOTZ RE: SEPTEMBER 2022 FEES/EXPENSES	1.90	674.50
10/27/22	LSM	REVISE EXHIBITS TO THIRTY-FIRST MONTHLY FEE APPLICATION FOR COLE SCHOTZ	0.60	213.00
10/27/22	LSM	COMPLETE DRAFT OF THIRTY-FIRST MONTHLY FEE APPLICATION FOR COLE SCHOTZ AND FORWARD TO J. DOUGHERTY RE: SEPTEMBER 2022 FEES/EXPENSES	0.90	319.50
10/27/22	JMD	REVIEW/REVISE SEPTEMBER FEE STATEMENT	1.10	440.00

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<u>DATE</u>	<u>INITIALS</u>	<u>Description</u>	<u>HOURS</u>	<u>AMOUNT</u>
10/27/22	JMD	EMAIL TO A. DELEO RE: REVISIONS TO SEPTEMBER FEE STATEMENT	0.10	40.00
10/27/22	LSM	EMAILS WITH C. MCMULLAN REGARDING MONTHLY FEE APPLICATION FOR COLE SCHOTZ RE: SEPTEMBER 2022	0.30	106.50
10/28/22	LSM	REVIEW AND EDIT EXHIBITS TO SEPTEMBER 2022 MONTHLY FEE APPLICATION FOR COLE SCHOTZ	0.60	213.00

**LITIGATION/ GEN. (EXCEPT AUTOMATIC STAY RELIEF) 70.70 46,668.00**

<u>DATE</u>	<u>INITIALS</u>	<u>Description</u>	<u>HOURS</u>	<u>AMOUNT</u>
10/04/22	JRA	EMAILS WITH J. RUBINSTEIN AND M. RUSH RE DISCOVERY AND CALL RE SAME	0.30	222.00
10/06/22	JRA	EMAILS WITH L. SYZMANSKI, A. CRAWFORD AND A. DELEO RE PRIVILEGE LOG	0.30	222.00
10/06/22	ADL	INSURANCE CLAIMS RESEARCH	3.10	2,123.50
10/06/22	JRA	REVIEW GULF DISCOVERY RESPONSES	0.40	296.00
10/06/22	ADL	CALL WITH INSURER COUNSEL RE: POLICY STIPULATIONS	0.30	205.50
10/07/22	ADL	ADDITIONAL INSURANCE CLAIMS RESEARCH	0.90	616.50
10/07/22	ADL	REVIEW INSURANCE CLAIMS RESARCH OUTLINE	1.30	890.50
10/07/22	ADL	INSURANCE CLAIMS RESEARCH	3.80	2,603.00
10/09/22	ADL	REVIEW COMMITTEE UPDATE	0.10	68.50
10/10/22	JRA	REVIEW J. DAVIS DISCOVERY LETTER	0.20	148.00
10/10/22	JRA	EMAILS WITH A. CRAWFORD RE DISCOVERY FOR INSURANCE ADVERSARY	0.30	222.00
10/11/22	ADL	INSURANCE CLAIMS RESEARCH	1.60	1,096.00
10/11/22	ADL	REVIEW REVISED DRAFTS OF INSURANCE POLICY STIPULATIONS (.3); EMAIL J. ALBERTO RE: SAME (.1)	0.40	274.00
10/11/22	JRA	REVIEW SRCS AND ASPEN POLICY STIPS (.2) AND EMAILS WITH A. DELEO RE SAME (.1)	0.30	222.00
10/12/22	ADL	REVIEW STEADFAST STIPULATION OF DISMISSAL; EMAIL UCC TEAM RE: SAME	0.20	137.00
10/12/22	ADL	INSURANCE CLAIMS RESEARCH	1.80	1,233.00
10/12/22	ADL	CALL WITH INSURERS RE: POLICY STIPULATION	0.30	205.50
10/12/22	ADL	CALL WITH L. SZYMANSKI RE: INSURANCE POLICY STIPULATIONS AND DEPOSITIONS	0.10	68.50
10/12/22	JRA	EMAILS WITH A. DELEO AND A. CRAWFORD RE STIPULATION OF DISMISSAL	0.20	148.00
10/12/22	JRA	FURTHER EMAILS WITH P. BREENE AND A. CRAWFORD RE DISCOVERY RESPONSES	0.30	222.00
10/12/22	ADL	ATTEND MEET AND CONFER WITH INSURERS RE: 30(B)(6)	1.50	1,027.50
10/13/22	IRP	INSURANCE CLAIMS RESEARCH	1.70	816.00
10/13/22	IRP	INSURANCE CLAIMS RESEARCH	2.30	1,104.00
10/13/22	IRP	INSURANCE CLAIMS RESEARCH	3.10	1,488.00

Re: OFFICIAL COMMITTEE OF UNSECURED CREDITORS  
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<u>DATE</u>	<u>INITIALS</u>	<u>Description</u>	<u>HOURS</u>	<u>AMOUNT</u>
10/14/22	JRA	REVIEW SUBSTANTIVE MEMO RE INSURANCE LITIGATION ISSUES	0.60	444.00
10/14/22	ADL	REVIEW EMAILS RE: INSURANCE LITIGATION ISSUES	0.30	205.50
10/14/22	ADL	INSURANCE CLAIMS RESEARCH	0.50	342.50
10/14/22	ADL	CALL WITH I. PHILLIPS RE: INSURANCE CLAIMS RESEARCH	0.20	137.00
10/14/22	JRA	EMAILS WITH R. LEVERIDGE AND A. CRAWFORD RE DISCOVERY	0.20	148.00
10/14/22	JRA	EMAILS WITH M. RUSH AND N. CRAMB RE MEET AND CONFER	0.20	148.00
10/17/22	JRA	EMAILS WITH A. DELEO RE SUPPLEMENTAL DISCOVERY RESPONSES	0.20	148.00
10/17/22	ADL	REVIEW EMAILS RE: INSURANCE LITIGATION ISSUES	0.10	68.50
10/17/22	ADL	INSURANCE CLAIMS RESEARCH	3.20	2,192.00
10/17/22	JRA	EMAILS WITH A. DELEO RE EXPERT RETENTION	0.10	74.00
10/18/22	ADL	ADDITIONAL INSURANCE CLAIMS RESEARCH	0.60	411.00
10/18/22	ADL	INITIAL REVIEW OF INSURANCE CLAIMS RESEARCH MEMORANDUM	2.60	1,781.00
10/19/22	ADL	MEET WITH C. MCMULLAN TO PREPARE REPORT RE: 30(B)(6) MEET AND CONFER	0.30	205.50
10/19/22	ADL	REVIEW EMAILS RE: INSURANCE DEPOSITIONS	0.20	137.00
10/19/22	ADL	REVIEW DOCUMENTS PRODUCED IN INSURANCE ADVERSARY PROCEEDING	3.00	2,055.00
10/19/22	CDM	CONFERENCE WITH ANTHONY DELEO RE: DISCOVERY CALL.	0.30	112.50
10/19/22	ADL	ATTEND CONTINUED MEET AND CONFER RE: INSURER 30(B)(6) DEPOSITIONS	0.60	411.00
10/19/22	JRA	EMAILS WITH C. SORENSEN, A. GASKE, J. RUBINSTEIN RE INSURANCE DISCOVERY	0.30	222.00
10/19/22	CDM	CALL RE: ADVERSARY PLAINTIFFS AND INSURERS RE: DISCOVERY.	0.60	225.00
10/19/22	ADL	CALL WITH A. CRAWFORD RE: INSURANCE LITIGATION ISSUES	0.10	68.50
10/19/22	ADL	INSURANCE CLAIMS RESEARCH	3.30	2,260.50
10/20/22	ADL	INITIAL REVIEW AND ANALYSIS OF CASE LAW CITED IN INSURANCE CLAIMS RESEARCH MEMORANDUM	4.10	2,808.50
10/20/22	ADL	REVIEW DOCUMENTS PRODUCED IN INSURANCE ADVERSARY PROCEEDING	3.80	2,603.00
10/21/22	ADL	REVIEW AND ANALYZE CASE LAW CITED IN INSURANCE CLAIMS RESEARCH MEMORANDUM	2.10	1,438.50
10/21/22	ADL	EMAIL R. LEVERIDGE RE: INSURANCE CLAIMS RESEARCH	0.10	68.50
10/21/22	ADL	CONTINUE TO REVIEW AND ANALYZE CASE LAW CITED IN INSURANCE CLAIMS MEMORANDUM	2.60	1,781.00
10/21/22	ADL	INITIAL REVIEW OF DEPOSITION SCHEDULE; EMAIL CS TEAM RE: SAME	0.20	137.00

Re: OFFICIAL COMMITTEE OF UNSECURED CREDITORS  
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<u>DATE</u>	<u>INITIALS</u>	<u>Description</u>	<u>HOURS</u>	<u>AMOUNT</u>
10/24/22	JMD	CONFERENCE CALL W/ A. DELEO, M. FITZPATRICK, P. STROM AND C. MCMULLAN RE: DEPOSITION COVERAGE	0.20	80.00
10/24/22	ADL	INSURANCE CLAIMS RESEARCH AND EMAIL TO UCC TEAM RE: SAME	3.20	2,192.00
10/24/22	CDM	CALL WITH ANTHONY DELEO, PETER STROM, JACK DOUGHERTY, AND MIKE FITZPATRICK RE: DEPOSITION ATTENDANCE.	0.30	112.50
10/24/22	ADL	EMAILS RE: INSURANCE LITIGATION ISSUES	0.30	205.50
10/24/22	PJS	CALL WITH A. DE LEO, M. FITZPATRICK, C. MCMULLAN AND J. DOUGHERTY RE DEPOSITIONS	0.20	75.00
10/24/22	ADL	CALL WITH CS TEAM RE: INSURANCE ADVERSARY DEPOSITIONS	0.10	68.50
10/24/22	JRA	EMAILS WITH A. DELEO AND A. DELEO RE POTENTIAL ESTATE CLAIM	0.20	148.00
10/24/22	ADL	REVIEW DOCUMENTS PRODUCED IN INSURANCE ADVERSARY PROCEEDING	2.90	1,986.50
10/24/22	MEF	CALL W/ A. DE LEO, P. STROM, J. DOUGHERTY, AND C. MCMULLAN RE: COVERAGE FOR UPCOMING INSURANCE LITIGATION DEPOS	0.20	80.00
10/25/22	ADL	ATTEND TRIAL PREP IN PURDUE (PARTIAL ATTENDANCE)	2.70	1,849.50
10/25/22	ADL	REVIEW INSURANCE CLAIMS RESEARCH	0.50	342.50
10/25/22	ADL	REVIEW DOCUMENTS PRODUCED IN INSURANCE ADVERSARY	3.80	2,603.00
10/27/22	JRA	EMAILS WITH A. GASKE AND A. DELEO RE DEPS AND DISCOVERY MATTERS	0.20	148.00
10/29/22	JRA	EMAILS WITH A. DELEO RE 30(B)(6) NOTICE	0.10	74.00
10/31/22	ADL	EMAIL P. CARRIG RE: INSURANCE ADVERSARY DEPOSITIONS	0.10	68.50
10/31/22	ADL	REVIEW STIPULATION RE: 30(B)(6) DEPOSITION	0.30	205.50
10/31/22	ADL	EMAILS RE: INSURANCE DISCOVERY ISSUES	0.20	137.00

**PREPARE FOR AND CONDUCT INTERVIEW AND DEPOSITIONS 2.30 1,702.00**

<u>DATE</u>	<u>INITIALS</u>	<u>Description</u>	<u>HOURS</u>	<u>AMOUNT</u>
10/11/22	JRA	EMAILS WITH P. BREENE AND A. CRAWFORD RE DEPOSITIONS AND DISCOVERY	0.30	222.00
10/12/22	JRA	EMAIL WITH P. BREENE RE LANDAU DEP	0.10	74.00
10/13/22	JRA	EMAILS WITH A. DELEO RE DEPS	0.10	74.00
10/21/22	JRA	EMAILS WITH A. DELEO RE DEPOSITIONS	0.30	222.00
10/24/22	JRA	FURTHER EMAILS WITH A. DELEO AND A. CRAWDORD RE DEPOSITIONS	0.30	222.00
10/26/22	JRA	EMAILS WITH A. GASKE, A. CRAWFORD AND A. DELEO RE DEPOSITIONS	0.30	222.00
10/26/22	JRA	FURTHER EMAILS WITH GILBERT AND A. DELEO RE DEPOSITION ISSUES AND STRATEGY	0.60	444.00

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<u>DATE</u>	<u>INITIALS</u>	<u>Description</u>	<u>HOURS</u>	<u>AMOUNT</u>
10/31/22	JRA	T/C (.1) AND EMAILS (.2) WITH A. DELEO AND A. CRAWFORD RE DEPS	0.30	222.00
TOTAL HOURS			103.70	

PROFESSIONAL SERVICES:	\$61,892.50
COURTESY DISCOUNT:	\$(6,189.25)
ADJUSTED PROFESSIONAL SERVICES:	\$55,703.25

**TIMEKEEPER SUMMARY**

<u>NAME</u>	<u>TIMEKEEPER TITLE</u>	<u>HOURS</u>	<u>RATE</u>	<u>AMOUNT</u>
Anthony De Leo	Associate	60.60	685.00	41,511.00
Conor D. McMullan	Associate	1.20	375.00	450.00
Ian R. Phillips	Associate	7.10	480.00	3,408.00
Jack M. Dougherty	Associate	12.10	400.00	4,840.00
Justin R. Alberto	Member	8.70	740.00	6,438.00
Michael E. Fitzpatrick	Associate	0.20	400.00	80.00
Morton, Larry	Paralegal	12.90	355.00	4,579.50
Patrick J. Reilley	Member	0.70	730.00	511.00
Peter J. Strom	Associate	0.20	375.00	75.00
<b>Total</b>		<b>103.70</b>		<b>\$61,892.50</b>

**COST DETAIL**

<u>DATE</u>	<u>Description</u>	<u>QUANTITY</u>	<u>AMOUNT</u>
10/03/22	PHOTOCOPY /PRINTING/ SCANNING	8.00	0.80
10/03/22	PHOTOCOPY /PRINTING/ SCANNING	2.00	0.20
10/11/22	PHOTOCOPY /PRINTING/ SCANNING	38.00	3.80
10/27/22	PHOTOCOPY /PRINTING/ SCANNING	1.00	0.10
10/27/22	PHOTOCOPY /PRINTING/ SCANNING	10.00	1.00
10/27/22	PHOTOCOPY /PRINTING/ SCANNING	1.00	0.10
10/27/22	PHOTOCOPY /PRINTING/ SCANNING	10.00	1.00
<b>Total</b>			<b>\$7.00</b>

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**COLE SCHOTZ P.C.**

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TOTAL SERVICES AND COSTS:	\$	55,710.25
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**EXHIBIT D**

**EXPENSE SUMMARY**  
**OCTOBER 1, 2022 THROUGH OCTOBER 31, 2022**

<b>Expense Category</b>	<b>Service Provider (if applicable)</b>	<b>Total Expenses</b>
Photocopy/Printing/Scanning		\$7.00
<b>TOTAL</b>		<b>\$7.00</b>



**EXHIBIT E**  
**Expense Detail**

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**COST DETAIL**

<b><u>DATE</u></b>	<b><u>Description</u></b>	<b><u>QUANTITY</u></b>	<b><u>AMOUNT</u></b>
10/03/22	PHOTOCOPY /PRINTING/ SCANNING	8.00	0.80
10/03/22	PHOTOCOPY /PRINTING/ SCANNING	2.00	0.20
10/11/22	PHOTOCOPY /PRINTING/ SCANNING	38.00	3.80
10/27/22	PHOTOCOPY /PRINTING/ SCANNING	1.00	0.10
10/27/22	PHOTOCOPY /PRINTING/ SCANNING	10.00	1.00
10/27/22	PHOTOCOPY /PRINTING/ SCANNING	1.00	0.10
10/27/22	PHOTOCOPY /PRINTING/ SCANNING	10.00	1.00
<b>Total</b>			<b>\$7.00</b>

TOTAL SERVICES AND COSTS: \$ 55,710.25